

# EXHIBIT 22

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

L.E., by his next friend and parents

SHELLEY ESQUIVEL, and MARIO ESQUIVEL

Plaintiff,

v.s.

Case No.

BILL LEE, in his official capacity as

3:21-cv-00835

Governor of Tennessee, et al

Defendants.

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REMOTE DEPOSITION of DR. GREGORY ALLEN BROWN,  
taken on behalf of the plaintiff, on September 7, 2022,  
at 10:00 a.m., pursuant to Notice of Taking Deposition,  
via Zoom, before Lakesha Jackson, Professional Court  
Reporter, in and for the District of Columbia.

A P P E A R A N C E S

SASHA BUCHERT, Esquire

Lambda Legal

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New York, New York 10005

Telephone: 212.809.8585

Counsel for the Plaintiff.

STEPHANIE A. BERGMEYER, Esquire

Board of Professional Responsibility

Of the Supreme Court of Tennessee

P.O. Box 20207

Nashville, Tennessee 37202-4015

Counsel for the Witness.

ALSO PRESENT:

SAMUEL STRONGIN

CLARK HILDABRAND

DAVID SANDERS

TARA BORELLI

I N D E X

WITNESS:	PAGE
DR. GREGORY ALLEN BROWN	
EXAMINATION BY Ms. BUCHERT.....	6

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1 providing any testimony about the problem of transgender  
2 boys taking opportunities from non-transgender boys in  
3 athletics?

4 MS. BERGMEYER: Object to form.

5 THE WITNESS: And if I may, I don't think that  
6 it's a simple yes-or-no answer, based on the  
7 information provided in my expert report. Because  
8 I'm expecting that the individuals who are reading  
9 this report will then take the information to make  
10 decisions without me necessarily saying this is  
11 explicitly my opinion on factor X or factor Y or  
12 something like that.

13 BY MS. BUCHERT:

14 Q Are you providing any testimony about the  
15 competitive advantages that transgender boys have  
16 against non-transgender boys in athletics?

17 A Do you mean transgender boys versus cisgender  
18 boys?

19 Q Right. Cisgender boys, yes.

20 A No, I have not evaluated that.

21 Q Great. Thank you.

22 In fact, there's nothing in your report at all

CERTIFICATE OF OATH

I, the undersigned authority, certify that  
DR. GREGORY ALLEN BROWN personally appeared before me  
and was duly sworn.

WITNESS my hand and official seal this 7th day  
of September, 2022

A handwritten signature in blue ink, appearing to read 'Lakesha Jackson', is written over a faint horizontal line.

Lakesha Jackson

Notary Public, Commonwealth of Virginia

C E R T I F I C A T E

I, Lakesha Jackson, Professional Court Reporter, do hereby certify that I was authorized to and did stenographically report the deposition of DR. GREGORY ALLEN BROWN; that a review of the transcript was requested; and that the transcript is a true and correct record of my stenographic notes.

I further certify that I am not a relative, employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

DATED this 22nd day of September, 2022



Lakesha Jackson

Professional Court Reporter